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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
JAIME VICENTE CABALLERO, )  
 )  
Defendant. )

No. CR 13-0318 RS

**STIPULATION AND ~~PROPOSED~~  
ORDER EXCLUDING TIME UNDER 18  
U.S.C. § 3161**

The parties in this case appeared before the Court on May 28, 2013, and June 25, 2013. At both appearances, the parties represented to the Court that granting exclusion of time under the Speedy Trial Act would allow the reasonable time necessary for effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv).

Specifically, on May 28, 2013, the parties agreed to exclude time under the Speedy Trial Act for effective preparation of counsel to allow defense counsel to review discovery disclosed by the government. The Court made findings consistent with that agreement, and set the matter to June 25, 2013.

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STIPULATION & ~~PROPOSED~~ ORDER EXCLUDING TIME  
CR 13-0318 RS

1 On June 25, 2013, the parties represented that additional discovery is anticipated in the  
2 case from the government. The Court set the matter to July 23, 2013, to allow disclosure of  
3 discovery and preparation of counsel. The parties agreed to exclude the period of time between  
4 June 25, 2013, and July 23, 2013, from any time limits applicable under 18 U.S.C. § 3161.

5 The parties agree that the ends of justice served by granting such an exclusion of time  
6 outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C.  
7 § 3161(h)(7)(A). At both hearings, the Court made findings consistent with this agreement.

8 SO STIPULATED:

9  
10 MELINDA HAAG  
United States Attorney

11  
12 DATED: June 25, 2013

13 \_\_\_\_\_/s/  
JANAKI GANDHI  
Special Assistant United States Attorney

14  
15 DATED: June 25, 2013

16 \_\_\_\_\_/s/  
JODI LINKER  
Attorney for Defendant Jaime Vicente Caballero

~~PROPOSED~~ ORDER

For the reasons stated above and at the May 28, 2013, and June 25, 2013, hearings, the Court finds that the exclusion from the time limits applicable under 18 U.S.C. § 3161 of the period from May 28, 2013, and July 23, 2013, is warranted and that the ends of justice served by the continuance outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A). Denying the requested exclusion of time would deprive the parties of the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv).

IT IS SO ORDERED.

DATED: 6/26/13



THE HONORABLE RICHARD SEEBORG  
United States District Judge